

1
2
3
4
5
6
7
8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 RICHARD KADREY, *et al.*,
13 Individual and Representative Plaintiffs,
14 v.
15 META PLATFORMS, INC., a Delaware
16 corporation,
17 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF KYANNA SABANOGLU IN
SUPPORT OF PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL SHOULD BE
SEALED [DKT. 520]**

1 I, Kyanna Sabanoglu, hereby declare:

2 1. I am an Associate General Counsel for Defendant, Meta Platforms, Inc. (“Meta”). I
3 provide this Declaration based on my personal knowledge and/or after a reasonable investigation
4 of the relevant facts. If called to testify as a witness, I could and would testify competently thereto.

5 2. Pursuant to Civil L.R. 79-5(f)(3) and the Court’s March 12, 2025 Order (Dkt. 477),
6 I make this Declaration in support of Plaintiffs’ Administrative Motion to Consider Whether
7 Another Party’s Material Should Be Sealed, (Dkt. 520 (“Sealing Motion”)), in consideration of and
8 in accordance with the Court’s guidance. Meta seeks leave to file under seal certain portions of
9 Plaintiffs’ April 7, 2025 Reply to Motion for Partial Summary Judgment and Opposition to Meta’s
10 Motion for Partial Summary Judgment (“Plaintiffs’ Reply and Opposition”).

11 3. Meta requests the Court’s permission to file under seal narrowly tailored portions of
12 Plaintiffs’ Reply and Opposition, as set forth in the redacted version filed by Plaintiffs pursuant to
13 the Court’s March 12, 2025 Order (Dkt. 477). Specifically, Meta respectfully requests the Court’s
14 permission to make redactions to two categories of information. **First**, Meta respectfully seeks to
15 redact information necessary to prevent the disclosure of Meta’s financial information, including
16 Meta’s internal financial forecasts and estimated revenues. Maintaining the confidentiality of
17 Meta’s non-public financial information is critical to Meta’s business. Disclosure of such
18 information, such as non-public forecasts of revenues associated with specific projects or ventures,
19 risks competitive harm to Meta, including by providing competitors and potential counterparties
20 insight into Meta’s financial analyses and business strategies. **Second**, Meta also respectfully seeks
21 to redact information necessary to prevent the disclosure of the identity of third-parties (who are
22 not parties to this lawsuit) and details of Meta’s negotiations with third parties, where Meta has
23 entered into and are subject to confidentiality and non-disclosure obligations and agreements,
24 where these third-parties obtained promises of confidentiality from Meta. Disclosure of such
25 information would put the third party’s confidential information at risk. To the extent the Court
26 believes the identity of these third-parties should be made public, Meta requests that the Court allow
27 these third parties an opportunity to put in their own declaration justifying confidentiality. Meta
28 has previously requested to seal documents based on similar third-party information, (e.g., Dkt.

391-1, ¶ 6; Dkt. 409-1, ¶ 12), which this Court has granted, (*e.g.*, Dkt. 393 (granting Dkt. 391); Dkt. 414 (granting Dkt. 409).)

* * *

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed in New York City, New York on this 14th day of April 2025.

4
5 

6 Kyanna Sabanoglu
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28